

TODD KIM, Assistant Attorney General
 S. JAY GOVINDAN, Section Chief
 BRIDGET K. MCNEIL, Assistant Section Chief
 CHRISTIAN H. CARRARA (NJ Bar No. 317732020)
 SAMANTHA G. PELTZ (IL Bar No. 6336536)
 U.S. Department of Justice
 Environment and Natural Resources Division
 Wildlife and Marine Resources Section, Natural Resources Section
 P.O. Box 7611
 Washington, DC 20044
 Tel: (202) 598-9736 (Carrara)
 Fax: (202) 305-0275
 Email: Christian.Carrara@usdoj.gov

Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

ANIMAL WELLNESS ACTION, a non-)
 profit corporation, CANA FOUNDATION,)
 a non-profit corporation, THE CENTER FOR)
 A HUMANE ECONOMY, a non-profit) Case No: 3:22-cv-00034-MMD-CLB
 corporation, LAURA LEIGH, individually, and)
 WILD HORSE EDUCATION, a non-profit)
 corporation,)

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF)
 INTERIOR, BUREAU OF LAND)
 MANAGEMENT, and JON RABY,)
 Nevada State Director of the Bureau of Land)
 Management,)

Defendants.

**FIFTH JOINT STIPULATION TO
 EXTEND THE DEADLINE FOR
 FILING A MOTION FOR
 ATTORNEYS' FEES**

Pursuant to Local Rule IA 6-1, Plaintiffs Animal Wellness Action, Cana Foundation,
 The Center for a Humane Economy, Laura Leigh, and Wild Horse Education, and Defendants
 United States Department of Interior, Bureau of Land Management ("BLM"), and Jon Raby,
 in his official capacity as Nevada State Director of the BLM (collectively, the "Parties"), by
 and through their undersigned counsel, hereby stipulate and respectfully request that the Court

1 extend the time to file any motions related to attorneys' fees and costs 30 days, until
2 December 12, 2024. The Parties declare in support of this request:

3 WHEREAS, on March 28, 2024, the Court issued an opinion and order on the Parties'
4 cross-motions for summary judgment. ECF No. 81.

5 WHEREAS, on March 29, 2024, judgment was entered by the Clerk of the Court. ECF
6 No. 82.

7 WHEREAS, the Parties filed three joint stipulations to extend the time needed to reach
8 an agreement-in-principle to settle attorneys' fees and costs. ECF Nos. 83, 87, 93.

9 WHEREAS, the Court granted the Parties' three joint stipulations. ECF Nos. 84, 88,
10 94.

11 WHEREAS, on October 8, 2024, the Parties informed the Court that they reached an
12 agreement-in-principle to settle attorneys' fees and costs and needed additional time to
13 finalize and obtain the necessary approvals for any settlement agreement, which the Court
14 granted. ECF Nos. 99, 100.

15 WHEREAS, the Parties agree that the proposed settlement agreement is currently
16 undergoing internal review and additional time is needed to obtain the necessary approvals for
17 any settlement.

18 WHEREAS, it is well-established that the court has the inherent power to "control the
19 disposition of the causes on its docket with economy of time and effort for itself, for counsel,
20 and for litigants." *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936); *CMAX, Inc. v. Hall*,
21 300 F.2d 265, 268 (9th Cir. 1962); *Leyva v. Certified Grocers of California*, 593 F.2d 857,
22 863-64 (9th Cir. 1979).

23 NOW, THEREFORE, IT IS STIPULATED BY AND BETWEEN THE PARTIES,
24 AND THE COURT ORDERS, AS FOLLOWS:

- 25 1. Upon entry of the Court's order, the deadline to file any motion for attorneys' fees
26 and costs is extended from November 12, 2024, until December 12, 2024.

27 IT IS SO STIPULATED.

1 Dated: November 8, 2024

Respectfully submitted,

2 TODD KIM
3 Assistant Attorney General
4 U.S. Department of Justice
5 Environment & Natural Resources Division
6 S. JAY GOVINDAN, Section Chief
7 BRIDGET K. MCNEIL, Assistant Section Chief

8 /s/ Christian H. Carrara
9 CHRISTIAN H. CARRARA, Trial Attorney
10 (NJ Bar No. 317732020)
11 Wildlife and Marine Resources Section
12 SAMANTHA PELTZ, Trial Attorney
13 (IL Bar No. 6336536)
14 Natural Resources Section
15 Ben Franklin Station
16 P.O. Box 7611
17 Washington, D.C. 20044
18 Tel: (202) 598-9736 (Carrara)
19 Fax: 202-305-0275
20 Christian.carrara@usdoj.gov

21 *Of Counsel:*
22 Janell M. Bogue
23 U.S. Dep't of the Interior
24 Office of the Solicitor
25 Pacific Southwest Region

26 *Attorneys for Federal Defendants*

27 /s/ Jessica L. Blome
28 Jessica L. Blome
(Cal. Bar No. 314898, admitted pro hac vice)
J. RAE LOVKO
(Cal. Bar No. 208855, admitted pro hac vice)
GREENFIRE LAW, PC
2748 Adeline Street, Suite A
Berkeley, CA 94703
(510) 900-9502
jblome@greenfirelaw.com
rlovko@greenfirelaw.com

Attorneys for Plaintiffs

IT IS SO ORDERED:

MIRANDA M. DU
UNITED STATES DISTRICT JUDGE

DATED: _____

CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2024, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the District of Nevada using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system, which includes counsel of record for all parties in the case.

/s/ Christian H. Carrara
CHRISTIAN H. CARRARA
Attorney for Federal Defendants